

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

<b>MABEL de JONGE,</b>	)	<b>File No. Civ. 10-4088</b>
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	<b>PLAINTIFFS' MOTION FOR JOINDER</b>
<b>Ability Insurance Company, f/k/a</b>	)	
<b>Medico Life Insurance Company,</b>	)	
<b>Ability Resources, Inc.,</b>	)	
<b>Ability Reinsurance Holdings Limited,</b>	)	
<b>a Bermuda Limited Company, Ability</b>	)	
<b>Reinsurance Limited, a Bermuda</b>	)	
<b>Limited Company, and Medico</b>	)	
<b>Insurance Company.</b>	)	
	)	
<b>Defendants.</b>	)	
	)	
	)	

COMES NOW the Plaintiff, by and through her attorney Mike Abourezk, and pursuant to Fed. R. Civ. P. 42(a), hereby moves the Court for an order joining Plaintiff's present action with corresponding cases separately filed in *Larry Stolz as Personal Representative of the Estate of Edna Wenzel; and Jean Andal, on her own behalf, vs. Ability Insurance Company, f/k/a Medico Life Insurance Company, Ability Resources, Inc., Ability Reinsurance Holdings Limited, a Bermuda Limited Company, Ability Reinsurance Limited, a Bermuda Limited Company, and Medico Insurance Company*, CIV. No. 10:4047.

The grounds for this motion are more fully set forth in Plaintiffs' Memorandum in Support of Motion for Joinder.

Dated this 19 day of August, 2011.

By:   
Mike Abourezk  
Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he served a true and correct copy of the foregoing **PLAINTIFF'S MOTION FOR JOINDER**, by electronic filing with the Clerk of Court's upon Defendants:

Mr. Gregory J. Erlandson  
Mr. Terry Westergaard  
Mr. Dan Duffy  
Bangs, McCullen, Butler, Foye & Simmons  
P.O. Box 2670  
Rapid City, SD 57709-2670

on this 19 day of August, 2011.

  
Mike Abourezk  
Attorneys for Plaintiff  
Post Office Box 9460  
Rapid City, South Dakota 57709  
(605) 342-0097 Ph.  
(605) 342-5170 Fax  
[mike@abourezk.com](mailto:mike@abourezk.com)